

# The CRTC and 21st century expectations of openness, transparency and accountability: a month of comments on how Parliament's delegate performs its responsibilities

#### 27: Accountability means signing and publishing decisions

#### 27 March 2023

This is the twenty-seventh of a series of comments by FRPC about the openness, transparency and accountability of the Canadian Radio-television and Telecommunications Commission (CRTC). Parliament established the CRTC on 1 April 1968 and delegated responsibility to it for implementing Parliament's broadcasting and telecommunications policies for Canada.

The Ministers of Canadian Heritage and Innovation, Science and Economic Development wrote Chairperson Eatrides in early February 2023 to offer congratulations on her appointment to the Commission<sup>1</sup> and also to "inform her of the Government's vision and priorities with respect to Canada's broadcasting and telecommunications system". <sup>2</sup> The Ministers said they sensed "that public confidence and trust in the CRTC has waned in recent years", pointing to undue delays in its decision-making, unequal access to its processes and the insufficient reasoning, evidence and data in the CRTC's determinations ("decisions").

The 21<sup>st</sup> to 30<sup>th</sup> commentaries in this series consider the 'accountability' of the CRTC. As noted above, the Heritage and ISED Ministers are concerned that public trust and confidence in the CRTC has been decreasing. What the Ministers' letter elides, however, is the degree to which the CRTC is accountable for its performance, and whether it should be more accountable as it (to quote the Ministers) "implements the laws and regulations set forth by Parliament in the public interest".

In Canada, accountability is facilitated by the 'open court principle', described almost thirty years ago by the <u>Supreme Court in 1996</u> as "deeply embedded in the common law tradition" (paragraph 21). The Court affirmed that "ensuring that justice be done openly ... has now become 'one of the hallmarks of a democratic society' .... and... acts as a guarantee that justice is administered in a non-arbitrary manner, according to the rule of law" (paragraph 22).

Although the CRTC is not a Court but a <u>quasi-judicial administrative tribunal</u>, publicly available information about its processes is also important to its accountability so that Canadians are able to monitor the Commission, its operations and its outcomes. Apart from demonstrating that it is successfully implementing the objectives established by Parliament in the <u>Broadcasting Act</u>, the <u>Telecommunications Act</u>, the <u>Canada Elections Act</u>, the <u>Accessible Canada Act</u> and the <u>Official Languages</u> <u>Act</u>, information about its processes and their outcomes permits its performance to be evaluated.

Many believe that the CRTC holds all of its proceedings publicly, and that it publishes all of its decisions. In <u>November 2022</u>, for instance, the then-Chairperson of the CRTC told the Senate Standing Committee

<sup>&</sup>lt;sup>1</sup> CRTC, "Meet Vicky" (accessed 1 March 2023).

Department of Canadian Heritage, "New CRTC Chair's Leadership Will Help Shape the Future of Canada's Communication System", News release (Gatineau, 6 February 2023).



on Transport and Communications that while the CRTC's deliberations are private like those of quasijudicial body, "the decisions or results of those deliberations are entirely transparent and public." The Commission also wrote in its 2022 *Departmental Results Report* that "[a]II CRTC regulatory policies and decisions are made via public proceedings that are open to Canadians" (see Figure 1).

Figure 1 CRTC, Departmental Results Report 2022, page 12

# Gender-based analysis plus

All CRTC regulatory policies and decisions are made via public proceedings that are open to all Canadians. To increase input from Canadians of all walks of life in its public proceedings, the CRTC organized a series of virtual consultations in February 2022 with 47 organizations

Yet the CRTC's claims that its consultations and decisions are public lack evidentiary support. Even researching these related issues is difficult.

To begin, along with "Decisions" the Commission or its staff also issue determinations about its proceedings using different names: Orders, Citations, Notices of Violation, Settlements, Undertakings, Commission Letters and Procedural Letters. Locating online decisions of the CRTC requires visits to five different CRTC pages and subordinate pages: Table 1.

Table 1

Table 1					
Main CRTC website page	CRTC Subcategories				
<u>Decisions, Notices and Orders</u>	<u>Decisions</u> Information Bulletins				
	<u>Orders</u>				
	Notices of Consultation				
	Regulatory Policies				
Broadcasting Applications Report	Decisions: if decision ha	s been made, may have or not			
	have an HTML link				
Telecommunications Applications Report	(No Decision numbers p	rovided on this page)			
Enforcement actions	Citations				
	Notice of Violation				
	Settlement				
	Undertaking				
	Compliance and Enforcement Decision				
Commission Letters 2022	Broadcasting	Letter			
		Procedural			
	Telecommunications	Letter			
		Procedural			
	Compliance and	Letter			
	Enforcement	(No Procedural in 2022)			



Finding information about these differently labelled decisions is complicated by the fact that the CRTC's website pages about its determinations are not consistently designed. The "Broadcasting Applications Report" includes decision numbers when decisions have been made and the dates when the CRTC posted applications, for example – but the "Telecom Applications Report" does not provide any information about decisions or applications' posting dates: Table 2.

Table 2

Main CRTC website page	Information provided
Decisions, Notices and Orders	Decisions, Information Bulletins, Orders
	Sector (Broadcasting/Compliance and
	Enforcement/Telecom)
	Number
	Description
	Notices of Consultation
	Sector (Broadcasting/ Compliance and
	Enforcement/Telecom)
	Number
	Type of consultation
	Brief description
	(other information)
<b>Broadcasting Applications Report</b>	Process (Part 1, Administrative)
	Applicant
	Application Number
	Subject
	[Date] Posted to Web
	Decision / Date / Status
<u>Telecom Applications Report</u>	Application Date
	Title/Subject
	File Number
Enforcement actions	Date
	Action type
	Person or business
	Details
Commission Letters 2022	Broadcasting
	Date
	Commission Letter / Procedural Letter
	Application number
	Description
	Compliance and Enforcement
	Date
	Commission Letter
	File number
	Description
	Telecommunications



Main CRTC website page	Information provided	
	Date	
	Commission Letter	
	File number	
	Description	

In the absence of a single page listing CRTC determinations, determining whether all decisions emerge from public consultations and whether all decisions are published requires users to visit eight separate CRTC website pages and to cut and paste the data on those pages to download into whatever software application suits the user. FRPC downloaded decisions made in 2022 (which we assumed to be a calendar year) into an Excel spreadsheet.

Analyzing the information published by the CRTC about its decisions showed 1,098 determinations made in 2022:

Website page and subheading				
	Broadcasting	Broadcasting Compliance and Tele Enforcement uni		Total
"Broadcasting Applications Report"				
[Decision - not listed]	346			346
Decision	114			114
Subtotal, decisions	460			460
"Commission Letters 2022"				
Letter	41	1	199	241
"Decisions 2022"				
Decision	88	4	58	150
"Information Bulletins 2022"	•			
Information Bulletin	7		3	10
"Notices of Consultation 2022"				
Decision	24	1	11	36
"Orders 2022"	•			
Decision	8	1	158	167
"Regulatory Policies 2022"	•			
Policy	8		2	10
"Enforcement actions" [2022]				
Citation		12		12
Decision		1		1
Notice of violation		1		1
Notice of violation & Settlement		9		9
Undertaking		1		1
Subtotal, enforcement actions		24		
Total	636	62	862	1,098
As percentage of total	57.9%	5.6%	78.5%	100.0%



However, the CRTC's website is entirely silent about two other sets of decisions made by the Commission – whether to consider the applications it receives, and the type of process to use when actually considering applications. According to the CRTC's by-laws its <u>Broadcasting Committee</u> "is delegated the authority to ... determine ... whether a public hearing is required" to renew or amend a broadcasting licence or to consider a complaint or representation (c(i) and (ii)), while its <u>Broadcasting committee subcommittee</u> for routine and non-contentious <u>matters</u> disposes of other applications. Its <u>Telecommunications Committee</u> meets "to inquire into and dispose of" a variety of telecommunications applications.

Figure 2: A-2018-00026

Based on information received from the CRTC under the *Access* to *Information Act*, the CRTC's committees meet almost weekly: Figure 2.

The decisions of these three committees, including the names of the CRTC Commissioners who voted on the decisions, are not posted on the CRTC's website.

Garr		Ja	PROTECTED 2019-01-22 11:41			
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1 NEW YEAR'S DAY	2	3	4	5	6
7	8 14:00 TCM-eM	9 11:00 Panel- eM 27 March Gatineau PH (N/A) Panel – WA (24 hour) 14:00 BCM-	10	11 11:30 Panel- eM Cost Order 14:00 TCM-eM	12	13
14	15	SC-eM Walk-Around 16	17	18 14:00 TCM 14:00 TCM-eM	19	20
21	22 14:00 TCM-eM	23 14:00 BCM 14:00 BCM- SC-eM Walk-Around	24	25 15:30 FCM ad hoc	26	27
28	29 13:00 Panel- eM Cost Order 14:00 TCM-eM (48-hour)	30 09:30 FCM and 11 January panel meeting (own. Items) 14:00 BCM- SC-eM Walk-Around (48-Hour)	31 09:30 FCM			

DECTED



Moreover, an analysis of the same types of calendars from January 2007 to December 2018 found references to acronyms for 42 other types of meetings:

Full Commission	BCM-SC-e-mail	Telecom Committee	SSM+	Panel ad hoc	PDR Management retreat	Urgent WA (BCE)
FCM	BCM-SC-eM G	TCM em	SSM+ Ad Hoc	Panel ad hoc G	PD&R	HSD session
FCM ad hoc	BCM-SC-eM WA (48-hr)	TCM em G		Panel eM	PMP Review Committee	WAB
FCM ad hoc G	BCM-SC-eM WA (48-hr)	TCM eM 48- hr		Panel eM G		
	BCM eM ad hoc	TCM eM 48- hr G		Panel eM ad hoc	1	
	BCM eM	TCM eM URGENT		Panel	1	
	BCM	TCM-eM ad hoc		Panel G		
	BCM ad hoc	TCM		Panel Expedited PH		
		TCM ad hoc		Panel TM Violation review	1	
				Panel TM Violation review Ad hoc	1	
				Panel TVRP G	1	
				Panel Walk-around		
				Panel eM Cost Order	1	

As the CRTC publishes no information about these meetings, about the Commissioners in attendance or about the Commissioners who vote on the meetings' determinations, it is unclear what role these meetings play in the 'outcomes' of the Commission.

In particular, it is not known whether the internal committees of CRTC Commissioners are deciding not to hear certain applications. This issue is of some significance because the CRTC's *Rules of Practice and Procedure* require parties that want the CRTC to exercise its authority in a specific matter to file an application with the Commission according to Part 1 of the *Rules*, explaining why and how the CRTC should act. Section 23 of the *CRTC Rules* then states that the Commission "must" post all applications it receives which follow its other requirements for style and contact information:

## Posting of application

23 The Commission must post on its website all applications that comply with the requirements set out in section 22.

## Affichage de la demande

23 Le Conseil affiche sur son site Web toute demande qui respecte les exigences prévues à l'article 22.



Having heard rumours about 'missing Part 1 applications', FRPC asked the CRTC for information about applications it had received and not posted. We received two separate responses describing 62 applications received by the CRTC – and not posted: Tables 3 and 4.

Table 3

Tabl	Access-to-information re					•
App. No.	pplications that were not posted and were returned by Applicant	Call Sign	m 1 January 2016 to 11 Se Location	Type Category		Status
2020-0536-3	Intercity Broadcasting Network Inc,	CKFG-FM	Toronto, ON	FM	Α	RWCS
2020-0405-0	The B,C, Conference of the Mennonite Brethren	CFEG-TV	Abbotsford, BC	TV	Α	RWCS
	Churches		,			
2020-0393-7	Les medias acadiens universitaires inc,	CKUM-FM	Moncion, NB	FM	Α	RWCS
2020-0344-0	My Broadcasting Corporation	CJMB-FM	Peterborough, ON	FM	Α	RWCS
2020-0130-4	La radio communautaire de LaSalle	CKVL-FM	Montreal (Lasalle), QC	FM	Α	RWCS
2019-1077-9	Fairchild Television Ltd,		Vancouver, BC	SPEC	R	RWCS
2019-1076-1	Fairchild Television Ltd,		Toronto, ON	SPEC	R	RWCS
2019-0784-1	Parrsboro Radio Society	CICR-FM	Parrsboro, NS	FM	Α	RWCS
2019-0723-9	Stingray Radio Inc,	CFXE-FM	Edson, AB	FM	R	RWCS
2019-0720-6	Stingray Radio Inc,	CHSL-FM	Slave Lake, AB	FM	R	RWCS
2019-0715-6	Stingray Radio Inc,	CKQK-FM	Charlottetown, PE	FM	R	RWCS
2019-0714-8	Stingray Radio Inc,	CHTN-FM	Charlottetown, PE	FM	R	RWCS
2019-0713-0	Stingray Radio Inc,	CHTN-FM	Charlottetown, PE	FM	R	RWCS
2019-0712-2	Stingray Radio Inc,	CFXE-FM	Edson, AB	FM	R	RWCS
2019-0705-7	Caper Radio Incorporated	CJBU-FM	Sydney, NS	FM	R	RWCS
2019-0687-7	Stingray Radio Inc,	CKQK-FM	Charlottetown, PE	FM	R	RWCS
2019-0671-0	Stingray Radio Inc,	CKXG-FM	Grand Falls, NL	FM	R	RWCS
2019-0660-4	Radio Diffusion Sorel-Tracy inc,	CJSO-FM	Sorel, QC	FM	Α	RWCS
2019-0631-4	Stillwater Broadcasting Ltd,	CJSB-FM	Swan River, MB	FM	R	RWCS
2019-0573-8	Utilities Consumers' Group Society	CJUC-FM	Whitehorse, YT	FM	Α	RWCS
2019-0534-0	Radio CJFP (1986) Itee	CIEL-FM	Riviere-du-Loup, QC	FM	Α	RWCS
2019-0401-1	Bell Media Inc,		Montreal, QC	DIS	Α	RWCS
2019-0346-9	8159203 Canada Limited	CKNT	Mississauga, ON	AM	Α	RWCS
2019-0111-6	TotalTV Inc,		Montreal, QC	CATV	R	RWCS
2019-0110-9	TotalTV Inc,		Toronto, ON	CATV	R	RWCS
2019-0006-9	Fabrique de la Paroisse de Saint-Gerard	VF8027	Weedon, QC	FM	R	RWCS
2018-1102-6	Radio communautaire du Labrador inc,	CJRM-FM	Labrador City, NL	FM	R	RWCS
2018-1066-4	Native Communications Society of the N,WT	CKLB-FM	Yellowknife, NT	FM	R	RWCS
2018-0987-3	Lenape Community Radio Society	CKBK-FM	Thamesville, ON	FM	R	RWCS
2018-0870-1	Radio communautaire MF Lac Simon inc,	CHUT-FM	Lac-Simon (Louvicourt), QC	FM	R	RWCS
2018-0869-3	Radio communautaire MF Lac Simon inc,	CHUN-FM	Rouyn-Noranda, QC	FM	R	RWCS
2018-0842-9	Corporation de Radio Kushapetsheken Apetuamiss Uashat	CKAU-FM	Maliotenam, QC	FM	R	RWCS
2018-0840-4	Micmac Historical Cultural Art Society	CFIC-FM	Listuguj, QC	FM	R	RWCS
2018-0839-6	Gespegewag Communications Society	CHRQ-FM	Restigouche, QC	FM	R	RWCS
2018-0828-9	Corporation Mediatique Teuehikan	CHUK-FM	Mashteuiatsh, QC	FM	R	RWCS
2018-0619-2	General Manager, Shubie FM Radio	CIPU-FM	Micmac, NS	FM	R	RWCS
2018-0408-9	Southshore Broadcasting Inc,	CFTV-DT	Leamington, ON	TV	Α	RWCS
2018-0317-2	Radio communautaire de Radisson	CIAU-FM	Radisson, QC	FM	Α	RWCS
2018-0277-8	Robert G, Hopkins	CFET-FM	Tagish, YT	FM	A	RWCS



#### Access-to-information release A-2020-00034: 54 applications that were not posted and were returned by the CRTC from 1 January 2016 to 11 September 2020 Location App. No. **Applicant** Call Sign Type Status Category 2018-0276-0 DHX Television Ltd, Montreal, QC SPEC RWCS Α 2018-0274-4 DHX Television Ltd, Toronto, ON SPEC **RWCS** 2018-0135-8 RWCS Bell Media Inc, CFTO-DT Toronto, ON TV Α 2018-0113-4 UP Canadian Cable Systems Alliance Inc, Α **RWCS** RWCS 2018-0055-8 Evanov Radio Group Inc, CHSV-FM Hudson, QC FΜ R 2018-0051-6 Ottawa Media Inc, CJWL-FM Ottawa/Gatineau, ON FΜ R RWCS 2018-0049-1 Dufferin Communications Inc. CHRC-FM Clarence - Rockland, ON FΜ RWCS 2017-1168-0 RWCS Kosiner Venture Capital Inc, COM Α 2017-0887-7 Dufferin Communications Inc, RWCS CIRR-FM Toronto, ON FΜ Α 2017-0885-1 Dufferin Communications Inc, CIDC-FM Orangeville, ON FΜ RWCS Α 2017-0819-0 RNC MEDIA inc, CKRN-DT Rouyn-Noranda, QC TV RWCS R 2017-0806-7 Small Town Radio CFWN-FM Port Hope, ON FΜ RWCS Α 2017-0779-6 RWCS Hector Broadcasting Company Limited CKEZ-FM New Glasgow, NS FΜ R 2017-0773-8 King's Kids Promotions Outreach Ministries **RWCS** CKOS-FM Fort McMurray, AB FΜ R Incorporated 2017-0491-6 1486781 Ontario Limited CFWC-FM Brantford, ON FΜ R RWCS

Total: 54 applications

Clarification received by e-mail on 15 October 2020:

Category: A = amendment R = renewal

RWCS: R = returned W = withdrawn at request of applicant (C and S: no longer used)

Table 4

Access-to-information release A-2020-00046: 8 Part 1 applications received by the CRTC from 1 January 2016 to 30 September 2020 which the CRTC did not post on its website								
App. No. Applicant Type Category* Stat								
2017-0657-4	Bell Canada**	POL	A (Amendment)	ACT				
2019-0734-6	Sound of Faith Broadcasting	FM	A (Amendment)	ACT				
2019-0857-6	Bell Media Regional Radio Partnership	AM	A (Amendment)	ACT				
2019-0894-8	Acadia Broadcasting Limited	FM	A (Amendment)	ACT				
2019-0924-3	1760791 Ontario Inc.	AM	A (Amendment)	ACT				
2019-0950-9	Rogers Media Inc.	FM	A (Amendment)	ACT				
2020-0372-1	Groupe TVA inc.	DIS	A (Amendment)	ACT				
2020-0541-2 Byrnes Communications Inc. FM A (Amendment) ACT								

Total: 8 applications

Clarification received by e-mail on 25 November 2020

Type: A: "Policy"

DIS: "Discretionary service"

Status: ACT: Active

\*A= Application for amendments

\*\* Application resolved through Supreme Court decision without further CRTC process required.



Neither of the Commission's access-to-information answers includes information about applications filed by non-broadcasters, including guilds, unions, associations or civil-society organizations, however, making it unclear whether a separate, as-yet-undisclosed process exists for the applications they make to the CRTC..

Insofar as the CRTC's statements that its decisions are public are concerned, results from the CRTC's online datasets show that of 752 decisions that include a decision, 683 are public because they have an HTML link. The remaining 69 decisions are shown (with their numbers) but cannot be accessed because there is no HTML link. None of the Citations issued by the CRTC is public: see Table 5.

Table 5

Matters about which CRTC issued decisions in 2022									
Page	Type of decision	Made	Made public with HTML link						
		No	Yes	Total					
"Broadcasting Applications Report"	Decision	57	57	114					
"Commission Letters 2022"	Letter		241	241					
"Decisions 2022"	Decision		150	150					
"Information Bulletins 2022"	Information Bulletin		10	10					
"Notices of Consultation 2022"	Decision		36	36					
"Orders 2022"	Decision		167	167					
"Regulatory Policies 2022"	Policy		10	10					
Enforcement actions	Citation	12		12					
	Decision		1	1					
	Notice of violation		1	1					
	Notice of violation & Settlement		9	9					
	Undertaking		1	1					
	Subtotal	12	12	24					
All categories		69	683	752					
Percent of total		9.2%	90.8%	100.0%					

As for former CRTC Chairperson Scott's comment that all CRTC processes are public, this is technically true. The CRTC does make public all of the applications it receives—but does not consistently publish these applications for public review and comment before it makes a determination about the applications. In 2022 the CRTC made decisions about 57 applications but published the applications the day it made its decision or afterwards. It posted decision 2022-41, for example, 27 days before it posted the application related to that decision.

Table 6

Decisions – and days between date of decision and date application posted									
Decision	Days after	Decision	Days after	Days after	Days after	Decision	Days after	Decision	Posted same day
2022-41	27	2022-34	7	2022-20	5	2022-8A	3	2022-1	0



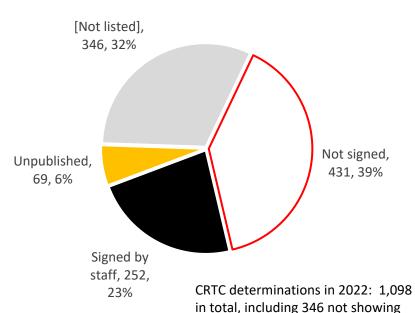
2022-25	22	2022-35	7	2022-21	5	2022-9	3	2022-10	0
2022-19	10	2022-36	7	2022-22	5	2022-31	2	2022-11	0
2022-18	8	2022-37	7	2022-23	5	2022-4	2	2022-13	0
2022-42	8	2022-38	7	2022-24	5	2022-16	1	2022-2	0
2022-43	8	2022-40	7	2022-49	5	2022-46	1	2022-32	0
2022-44	8	2022-6	7	2022-50	5	2022-51	1	2022-39	0
'2023-1	7	2022-7	7	2022-17	3	2022-52	1	2022-45	0
'2023-4	7	'2023-2	7	2022-28	3	2022-57	1	2022-47	0
2022-14	7	'2023-3	7	2022-29	3			2022-48	0
2022-15	7	2022-12	6	2022-3	3			2022-54	0
2022-30	7	2022-56	6	2022-53	3			2022-55	0

A final point has to do with who actually makes the CRTC's decisions. The majority of determinations issued by the CRTC in any year are clearly identified as "Decisions", and these are 'signed' by the CRTC's Secretary General.

From 1968 to 1990 it made sense for the CRTC's Secretary General to sign its Decisions because, in fact, decisions made by hearing panels were subsequently considered by the "Full Commission" – all CRTC Commissioners whether they had or had not been part of the hearing panels. The 1991 *Broadcasting Act* changed this approach: today, the members of a CRTC hearing panel are empowered by section 20(2) to act on its behalf. The CRTC's continued practice of not identifying the Commissioners who voted on its decisions obscures the fact that some Commissioners – under the *Broadcasting Act* – should not be entitled to vote on matters they themselves did not 'hear'.

In 2022 the CRTC listed 1,098 matters that it was considering or that it had decided. Almost a third of these (346 or 32%) did not include

a determination or decision, indicating that the CRTC had not yet made a determination. In 252 (23%) of the matters decisions were issued as CRTC letters and were signed by individual members of the CRTC's staff. Of the decisions about the remaining matters, 69 (6%) of the decisions were listed but unavailable for public review because they lacked HTML links – and it is therefore unknown if these decisions were signed. The largest group of decisions – 431 or 39% -- were issued over the signature of the



any decisions ("[Not listed])



Secretary General and did not identify which CRTC Commissioners were responsible for the determinations.

What remains unclear is why the CRTC has adopted a practice of identifying the staff responsible for certain determinations, while concealing the identities of the Commissioners responsible for deciding applications. It is also unclear why the CRTC is silent about an important part of the its decision-making – namely, whether to consider specific matters at all.

#### Recommendations

The CRTC should publish all of its decisions and determinations, and should include the names of the CRTC Commissioners who voted on these matters.

Maintaining the *status quo* – in which CRTC Commissioners' decisions are made in anonymity and behind closed doors – has the potential to bring the CRTC's administration of its responsibilities into disrepute.

~ Forum for Research and Policy in Communications (FRPC)

#### Other comments in this series

1 March 2023: Openness means not hiding applications from public view

2 March 2023: Openness means not just describing but explaining the CRTC's process and proceedings

3 March 2023: Openness means 'real' public hearings, published decisions and published meeting

schedules

4 March 2023: Openness means publishing information about CRTC meetings with those it regulates

5 March 2023: Openness today means easier access to CRTC programming, ownership and financial data

6 March 2023: Openness means knowing who sets the CRTC's agenda

7 March 2023: Openness means disclosing relevant evidence

8 March 2023: Openness means being open to all, not just to some or most

9 March 2023: Openness means timeliness

10 March 2023: Openness means active efforts by CRTC to engage public

11 March 2023: Transparency means being clear (about being transparent)

12 March 2023: <u>Transparency means clarity about planning processes</u>

13 March 2023: Transparency means disclosing dealings, including meetings

14 March 2023: Transparency means clear process

15 March 2023: Transparency means operational clarity



16 March 2023: Transparency means operational timeliness
17 March 2023: Transparency means clarity about evidence
18 March 2023: Transparency means access to evidence, not selective smokescreening
19 March 2023: Transparency means meaningful access to information
20 March 2023: Transparency means comparability of data over time
21 March 2023: Accountability means more meaningful consultation with Canadians
22 March 2023: Accountability means more access without the Access to Information Act
23 March 2023: Accountability means an Information-Highway approach to due process
24 March 2023: Accountability means transparency about dispute-resolution outcomes
25 March 2023: Accountability means well-designed data collection to evaluate policy
26 March 2023: Accountability means public performance evaluations showing whether Parliament's communications laws are being implemented

27 March 2023: Accountability means signing and publishing decisions